

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHERN DIVISION**

CAROLYN BEECH, ON BEHALF OF ) CASE NO.: 1:22-CV-00057-HSO-BWR  
HERSELF AND THE CLASS MEMBERS )  
DESCRIBED BELOW, ) JUDGE: HALIL S. OZERDEN  
 )  
PLAINTIFF, ) MAGISTRATE JUDGE: BRADLEY W.  
 ) RATH  
VS. )  
 )  
THE LITIGATION PRACTICE GROUP, PC, )  
 )  
DEFENDANT.

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**DEFENDANT THE LITIGATION PRACTICE GROUP PC'S RESPONSE IN  
OPPOSITION TO PLAINTIFFS' MOTION FOR EXTENSION OF CASE DEADLINES**

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Now comes Defendant The Litigation Practice Group PC (“LPG” or “Defendant”), by and through its undersigned counsel, and hereby respectfully requests that this Court deny Plaintiff’s Motion for a 90-day Extension of Case Deadlines.

LPG is a law firm organized under California law as a Professional Corporation. LPG practices primarily in the areas of bankruptcy, civil litigation, commercial litigation, real estate litigation, and collections harassment/FDCPA claims. When she filed her original class action Complaint, Plaintiff was aware that LPG is a law firm. Plaintiff was also aware of the areas of law in which LPG practices. Nonetheless, Plaintiff sought discovery information and documents that she knew were governed by the attorney-client privilege and/or the attorney work product doctrine. While Beech may waive her own entitlement to the privilege, she certainly cannot do so on behalf of other non-present putative class members nationwide. LPG correctly asserted the privilege in response to Plaintiff’s discovery requests.

Through no fault of LPG, Beech now seeks an extension of discovery deadlines due to her pending motion to compel. This is Plaintiff's own doing, seeking discovery of information clearly governed by the attorney-client privilege. Extending the discovery deadlines will be futile because Plaintiff is not entitled to any further documents because of the attorney-client privilege.

Accordingly, LPG respectfully requests that the Court deny Plaintiff's Motion to Extend Case Deadlines because it is futile.

Respectfully submitted,

*/s/ Rebecca J. Mansell*

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**LUPER NEIDENTHAL & LOGAN**  
A Legal Professional Association

*/s/ Matthew T. Anderson*

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*Attorneys for Defendant The Litigation Practice Group PC*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing has been filed via the Court's electronic filing system on this 2nd day of December 2022. Notice of filing will be performed by the Court's electronic filing system, and Parties may access the document through the Court's electronic filing system.

*/s/ Rebecca J. Mansell, Esq.  
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Attorney for Defendant*